

Within the scope of and has direct relationship with the proposed action, and includes support reason for the responsible official to consider		
Source	Comment	Response
American Forest Resource Council 6	We would like the Plumas NF to consider a recently published study conducted by NCASI when assessing treatment areas and their potential affects to owls (Irwin, L.L., D.F. Rock, S.C. Rock, C. Loehle, and P.V. Deusen. 2015).	The IR do not preclude mechanical treatments within suitable CSO habitat. Rather, they recommend that no mechanical treatment occur within the designated habitat acres unless it is intended to maintain or improve habitat conditions for the spotted owl in the short-term (1-5 years). Loehle et al. (2015) discuss management implications for mixed conifer forests might call for thinning from below and thinning small understory trees to improve foraging habitat in the short term. They also recommend that more intensive partial harvests seem likely to result in negative effects on spotted owls. See draft Decision Notice.
American Forest Resource Council 8	Alternative C (the IR alternative) is less effective than alternative B and it may need to be subsidized with other funding sources. Choose alternative B.	It is our intention to draft a decision that minimizes the need for the project to be subsidized with other funding while fully following interim recommendations.
Sierra Forest Legacy 1	Until the development of a peer reviewed and scientifically-supported final conservation strategy the IR should be considered the best available science. As such, IR alternative should be selected.	Our IDT reviewed the literature cited as well as the IR and incorporated this into the planning of an IR alternative. The decision maker intends IR to be followed in the final decision.
Sierra Forest Legacy 2	Effective fuel treatments do not need to degrade spotted owl habitat.	Although this is not primarily a fuels reduction project so much as it is a forest health and habitat improvement project, fire resistant stand structure is still a project goal. The intent is to achieve project purpose and need without degrading spotted owl habitat.
Sierra Forest Legacy 3	Ask you remove references to economic feasibility from the analysis and simply refer to the economic cost and benefit of the different alternatives.	After seeking clarification, the commenter is concerned about the prejudicial inference of using terms such as feasible and that “feasibility” can be arbitrarily met, or failed

		to be met, by manipulating the amount, type, and mix of treatments without a deeper cost, revenue, and benefits discussion.
Center for Biological Diversity 1	Choose the IR alternative although we would prefer you withdraw all mechanical thinning in owl habitat.	Our IDT reviewed the literature cited as well as the IR and incorporated this into the planning of an IR alternative. The decision maker intends IR be followed in the final decision. The IR do not preclude mechanical treatments within suitable CSO habitat. Rather, they recommend that no mechanical treatment occur within the designated habitat acres unless it is intended to maintain or improve habitat conditions for the spotted owl in the short-term (1-5 years).
Center for Biological Diversity 2	Recent literature reiterates that loss of canopy cover and forest complexity from logging is detrimental to owls.	We are proposing treatments that will address the high numbers of trees per acres while working to maintain canopy cover and forest complexity within designated habitat. We are proposing a combination of treatments specific to stand characteristics including prescribed fire only, HCPB, thinning from below and biomassing, and follow-up and maintenance burning. Please refer to CBD 1 above.
Comments that do not identify disagreement with the proposed action or project; or meet nonsignificance		
Source	Comment	Response
Dick Artley – A (issue 1)	Please respond to each opposing view and post the responses online for the public to see. Reference to 40 CFR 1502.9.	The comment email contains attachments with numerous excerpts from a variety of different authors in different locations and with different objectives. While we do not necessarily dispute disclosures in the cited documents, neither do we categorically agree with the findings or recommendations in the literature referenced. More importantly, the attachments are not within the scope of the proposed action, have a direct relationship to the

		proposed action, or include supporting reasons for the responsible official to consider. 40 CFR 1502.9 is specific to Environmental Impact Statements (EIS), not EA.
Dick Artley 1 (comment 1)	Logging and roading damage amenity resources. The NEPA document (EA) effects should address the science presented.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 2	National Forests are not private industrial tree farms, nor should they be treated that way to achieve tree farm goals.	The commenter doesn't differentiate between industrial tree farming and vegetation management of public lands. The project does not include any proposal to implement private industrial tree farming treatments.
Dick Artley 3	Don't claim this timber sale is needed to help supply the public's need for wood products. Remove "Utilize removed material – timber and smaller trees – to create an economic benefit locally and generate partial funding for the required noncommercial thinning and burning fuel treatments" from the purpose and need.	The project does not claim this timber sale is needed to help supply the public's need for wood products. The stated purpose and need expresses two important needs that are discussed in the environmental effects.
Dick Artley 4	The project does not comply with leadership statements regarding best science.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 5	The recommendations of hundreds of Ph.D. independent scientists with no interest in volume is clearly "best science".	Refer to comment Dick Artley – A above. The project was developed using management strategies set out in PSW-GTR-220; PSW-GTR-237; and RMRS-GTR-292. These technical reports summarize the best available science for managing Sierra Nevada mixed conifer forests. The commenter does not provide science to support reasons for

		the responsible official to consider.
Dick Artley 6	The EA should reference science used to prepare the 2000 final rule on Forest Service planning.	The commenter doesn't differentiate between forest planning and project planning. Comments addressing analysis of the 1988 Plumas LRMP and 2004 SNFPA FEIS and ROD are outside of the scope of this project. New and relevant scientific information will be reviewed where it is applicable to project, site-specific analysis.
Dick Artley 7	Scientists quoted in the attachments describe how timber sales will harm and sometimes destroy plants, animals, and their habitats near the sale.	The EA contains analysis of beneficial and adverse effects from project activities completed by various Forest Service resource professionals. Other resource analysis for which no project, site-specific issues were identified are part of the project record. The APA states that agencies are entitled to rely on the view of their own experts". The courts have reinforced this determination.
Dick Artley 8	The USDA Office of Inspector General concludes that commercial timber sales are not restoration projects.	The project is an integrated vegetation management project that includes commercial and non-commercial thinning, mastication, and prescribed fire. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 9	Please explain why NOAA should not be trusted.	Refer to comment Dick Artley – A above. In the case of Forest Service prepared documents, it is assumed that the authors used the most recent and applicable literature given that location or their particular project area, the stands types and conditions at the time, and the directions and/or definitions in their Forest Plan(s). As highlighted by some of the excerpts you've provided, an abundance of literature and opinion are available on a variety of subjects, each with

		its own recommendations/findings depending upon the specific site characteristics, research methodology and/or objectives, and/or disturbance event. While general disagreement in the literature exists on many subjects, one common conclusion that can be drawn in almost all cases is that every site and every situation is different. This, in part, is why site-specific analyses are completed. As part of this site-specific analysis the resource experts assigned to the project have the responsibility to determine what the most appropriate scientific literature/information is that reflects the specific project area and situations. The EA completed for this assessment lists cited references where appropriate and provides a list of references.
Dick Artley 10	Clearly, and action that destroys soil, watersheds and biodiversity of native forests is not a restoration project.	Refer to comment Dick Artley 9 above.
Dick Artley 11	An action that damages watersheds, destroy wildlife habitat and imperil plant and animal species is not a restoration project.	Refer to comment Dick Artley 9 above.
Dick Artley 12	Please read what scientists think about your claim that logging restores the forest.	Refer to comment Dick Artley – A above.
Dick Artley – B (issue 2)	Logging road construction causes significant ecological harm. Please analyze an action alternative in detail that does not construct any new roads.	The commenter is concerned about construction of new roads. Temporary road construction and/or reconstruction would be designed and implemented using Best Management Practices (BMP) and would be obliterated at the end of project activities. The project does not contain a proposal to construct new NFS roads. In accordance with the Healthy Forests Restoration Act (HFRA) of 2003 there is no need to evaluate an action alternate that does not

		construct any new roads (temporary or system) as the commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Dick Artley 13	Page 6 [of the EA] indicate you plan to construct 1.7 miles of new road as part of the proposed action.	The commenter doesn't differentiate construction of new National Forest System road and construction and subsequent obliteration of temporary road designed and implemented using BMP. The EA does not analyze for this action as the hydrology report determined that for all project subwatersheds, hydrologic function remains intact, for no action and for all action alternatives.
Dick Artley 14	Don't exclude a no new road alternative from analysis by claiming the purpose and need will not be met.	We do not. Refer to comments Dick Artley 12 and 13 above.
Dick Artley 15	Without exception, road construction and reconstruction are activities that cause damage to some important natural resources in the forest.	Refer to comment Dick Artley 9, 12 and 13 above.
Dick Artley 16	Since best science and Dr. Dombeck agree that there are few more irreparable marks we can leave on the land than to build a road isn't this a valid reason to analyze a no new road alternative in detail?	Refer to comment Dick Artley 9, 12, and 13 above.
Dick Artley 17	Under the arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law standard of the APA you must consider an action alternative with no new road work.	The EA contains analysis of beneficial and adverse effects from project activities completed by various Forest Service resource professionals. Other resource analysis for which no project, site-specific issues were identified are part of the project record. The APA states that agencies are entitled to rely on the view of their own experts". The courts have reinforced this determination. Refer to comments Dick

		Artley B and 13-16 above.
Dick Artley 18	It is time the USFS stops deceiving the public hoping they will think logging is ecosystem friendly.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 19	You propose to construct new roads in the forest to give you the opportunity to log the forest knowing both activities cause unacceptable natural resource damage.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence. Refer to comments B, 9, and 13-16 above.
Dick Artley – C (issue 3) John Muir Project 2	Assure DN states herbicides that contain glyphosate will not be applied. We support the removal of invasive plants, but with minimal use of potentially harmful herbicides. We are concerned that the use of mechanical equipment up to the edge of meadows will encourage establishment of invasive plants.	The project does not propose the use of any herbicide application. The issue is conjectural and not supported by factual evidence. Due to the results of survey effort there is a low risk of increased noxious weed invasion. The project specific measures are SOP prevention measures (weed free equipment, avoid driving or parking on occurrences, pile and burn on occurrences) and to hand-treat (pull) any noxious weeds that may be found within the project area.
Dick Artley – D (issue 4)	Vigor and increased growth of trees is important only to foresters who manage private industrial tree farms where every tree is destined for the mill.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 20	Forests with vigorous, fast-growing trees are what foresters managing private industrial tree farms strive to create.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 21	You present no monitoring data showing there is a shortage of vigorous trees in the sale area.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible

		official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley – E (issue 8)	The EA fails to describe the effects to air quality, botany, cultural, hydrology, soils, special uses, minerals, recreation & scenery, and roads in Chapter 3.	The commenter doesn't differentiate Environmental Impact Statement (EIS) and Environmental Assessment (EA). The EA shall provide sufficient evidence and analysis, including the environmental impacts of the proposed action and alternatives(s) to determine whether to prepare either an EIS or a FONSI. [It] may incorporate by reference data, inventories, other information and analyses. Resources that are minimally impacted and therefore not further analyzed include: air quality, botany, cultural, hydrology & soils, land & special uses, minerals, recreation & scenery, and roads & engineering.
Dick Artley 22	I suggest you contract out future NEPA document preparation until you and your IDT members successfully complete a rigorous course in NEPA.	See comment Dick Artley – E above.
Dick Artley 23	You have chosen to hide this information from the public in order to reduce controversy associated with the proposed action which will increase the chances you will get your precious volume.	See comment Dick Artley – E above. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley – F (issue 9)	The EA does not discuss how the timber sale's logging and slash/RX burning activities will be mitigated to assure protected bird species individuals and their habitat are not harmed in any way.	There are no Threatened, Endangered, Proposed, or Candidate bird species within the project area. On September 18, 2015, the USFWS issued a positive 90-day finding on a petition to list the California spotted owl. A positive 90-day finding indicates that the USFWS believes that substantial scientific or commercial information was provided by the petitioner and that the petitioned action may be warranted. An action alternative was developed and

		analyzed following the interim recommendations for the management of California spotted owl habitat on National Forest System lands.
Dick Artley 24	Your references section does not contain the following important literature or comparable literature, therefore your migratory bird discussions are based on unsubstantiated speculation.	Current management direction relevant to the proposed action as it affects migratory birds can be found in: Forest Service Manual and Handbooks (FSM/H 2670), Plumas National Forest Land and Resource Plan (LRMP 1988), and the Sierra Nevada Forest Plan Amendment (SNFPA 2004). Each of these planning efforts have addressed and considered opportunities to promote the conservation of migratory birds and their habitats at the project level through the adherence of Forest Plan Standard & Guidelines.
Dick Artley – G (issue 13)	Increases in national forest logging do not stabilize or enhance the economy of small communities located near the forest.	The project does not include this statement in the purpose and need. The purpose and need from the EA which is later quoted is not the same. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Dick Artley 25	The EA must describe why a June 2000 study from Washington State does not apply to this project.	See Dick Artley – G above.
Dick Artley 26	Why do you reject the findings and conclusions of Undersecretary of Agriculture Jim Lyons?	See Dick Artley – G above.
Dick Artley 27	You reject the research conclusions of 241 Ph.D. scientists quoted in Opposing Views Attachment #1.	See Dick Artley – A, Dick Artley – G, and Dick Artley 5 above.
Dick Artley 28	If you were really concerned about local community stability and local job creation you would offer this sale as an SBA sale.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not

		supported by factual evidence.
Dick Artley – H (issue 16)	Noise and dust caused by timber harvest adversely affects recreation and wildlife, thus these adverse social and environmental impacts must be disclosed.	Please refer to Dick Artley – E above.
Dick Artley 29	Under NEPA required to disclose and analyze all effects positive and negative.	Please refer to Dick Artley – E above.
Dick Artley – I (issue 17)	You do not disclose how implementing the Gibsonville timber sale will affect climate change.	Please refer to Dick Artley – E above. Refer to page 39 of Silviculture report and to ‘A summary of current trends and probable future trends in climate and climate-driven processes in the Sierra Cascade Province, including the Lassen, Modoc, and Plumas National Forests’. The commenter does not provide a direct relationship to the proposed action or supporting reason for the responsible official to consider.
Dick Artley – J (issue 18)	If you care about maintaining aquatic species health you would indicate that all newly constructed temporary roads will be obliterated after use.	Please read page 6 of the EA.
Dick Artley 30	If you do not indicate that your proposed temporary roads will be obliterated it will show you plan to allow these temporary roads to pump sediment for decades.	Please refer to Dick Artley – J above.
Dick Artley 31	Refers a quote from J.E. Moll, 1996 regarding obliterating temporary roads.	Please refer to Dick Artley – J above.
Dick Artley 32	Refers a quote from the EPA regarding obliterating temporary roads.	Please refer to Dick Artley – J above.
Dick Artley 33	You ignore agency best management practices.	Please read Table A., Management requirements to reduce or prevent adverse effects by Gibsonville Project.

Dick Artley – K (issue 20)	The proposed action will clearly cause the resource degradation and destruction described in the attachments.	Refer to comment Dick Artley – A and Dick Artley 9 above.
Dick Artley 34	The Gibsonville timber sale will cause major damage to non-vegetative natural resources described by hundreds of Ph.D. experts.	Refer to comment Dick Artley – A and Dick Artley 9 above.
Dick Artley 35	The Gibsonville sale will take away more undeveloped national forest acres from the legacy the unborn kids of the future.	The Gibsonville project area is young growth forest within highly disturbed hydraulic mining lands. The EA clearly sets out the unnatural conditions on the ground. The commenter does not provide a direct relationship to the proposed action, local environment, or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
American Forest Resource Council 1	The project's thinning should be designed to ensure that stocking density does not exceed an upper limit of 60% of maximum SDI for at least the next 20 years.	The issue is already decided by higher level decision: The Forest Plan as revised sets standards and guidelines that include minimum retained basal area and canopy cover.
American Forest Resource Council 2	If the biomass planned for removal is not in an HHZ, and therefore unlikely to be purchased, the removal of the biomass should not be required under timber sale contracts; it should be subject to agreement.	The entire project area is within Tier 1 and 2, HHZ. The contract requirements will be to remove biomass to the landings. Removal from the project area would be subject to agreement if a purchaser is likely.
American Forest Resource Council 3	The Forest needs to consider using regular wildlife (California spotted owl) surveys over large areas to possibly clear individual projects from needing to apply LOPs.	Spotted owl surveys in the Gibsonville area occurred in 2011, 2012, 2013, and 2016. Prior to implementing activities within or adjacent to a PAC, we will conduct surveys to establish or confirm the location of the nest or activity centers for the LOP.
American Forest Resource Council 4	We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on	Contract provisions are in place to provide resource protection and adherence to BMP. Most are standard in Forest Service contracts and will not be changed. As long as

	descriptive end-results.	requirements for resource protection are met, no restrictions are made on type of equipment used to get the work done (EA page 26).
American Forest Resource Council 5	Please see the attached document titled 'NSO Canopy Condition' as an addendum to these comments for consideration in how the treatments on this project are designed and how this design affects the spotted owl. Based on this extensive literature review, AFRC has concluded that canopy condition related to the effects on spotted owls should be measured using canopy closure rather than canopy cover.	The attached document contains a review with numerous excerpts from a variety of different authors in different locations and with different objectives. While we do not necessarily dispute disclosures in the cited documents, neither do we categorically agree with the findings or recommendations in the literature referenced. The issue is already decided by higher level decision: both the forest plan as amended and the IR set standards and guidelines for maintaining spotted owl habitat measured using canopy cover. Forest Plan revision and a new CSO Conservation Strategy are the appropriate scope for the issue.
American Forest Resource Council 7	There is a need to develop water sources on the sale area for general road dust abatement as well as for fire suppression, under-burning, and wildlife needs.	There are water sources existing along the LaPorte Quincy Road. Water source development is beyond the scope of this project as no issues relating to water sources were identified during project development and/or scoping. We can look into the need to develop additional water sources during future projects.
Plumas Forest Project 1	I believe the most prudent and effective course of action would be to analyze and implement a handthin/underburn and underburn only alternative.	IAW HFRA 2003, an additional action alternative is developed if, proposed during scoping or the collaborative process and meets the purpose and need of the project. The commenter does not address the purpose and need for this project. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Plumas Forest Project 2	The EA should also analyze a 2001 Framework alternative because of the USFWS's current 90-day	In late 2014, the Forest Service commissioned a group of prominent spotted owl scientists and forest ecologists from

	finding on a petition to list the California spotted owl.	within and outside of the Forest Service to recommend changes to current management direction needed to provide for the conservation of the species. The culmination of this effort was the May 2015 interim recommendations. The IR represent the best available science on California spotted owl management in the Sierra Nevada. As such, an alternative consistent with the IR was developed for the project as analyzed in the EA.
Plumas Forest Project 3	I don't believe in aspen restoration through mechanical means.	As part of this site-specific restoration project the resource experts assigned have the responsibility to determine what the most appropriate scientific literature/information is that reflects the specific project area and situations. The project record lists cited references where appropriate and provides a list of references. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.
Plumas Forest Project 4	Provided an anecdotal story about Variable Density Thinning.	The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider.
Plumas Forest Project 5	There is a lot of top-notch science out there regarding severe bark beetle infestations and whether or not logging is an appropriate response. I'm in favor of the science that says it's not. I'm a firm believer that the forest can largely manage its own affairs far better than we can.	As part of this site-specific restoration project the resource experts assigned have the responsibility to determine what the most appropriate scientific literature/information is that reflects the specific project area and situations. The project record lists cited references where appropriate and provides a list of references. The commenter does not provide a direct relationship to the proposed action or supporting reasons for the responsible official to consider. The issue is conjectural and not supported by factual evidence.

John Muir Project 1	We support the protection and enhancement of cultural features within historic Gibsonville. The 2004 Framework assumed that structure protection is best accomplished by a ¼-mile wide Defense Zone surrounding towns, and groups of cabins, as well as an additional 1.5-mile wide Threat Zone surrounding the Defense Zone. This is refuted by newer and more robust scientific information.	The issue is irrelevant to the decision to be made. The historic Gibsonville townsite restoration is not WUI defense. This part of the project was proposed and developed by the district Archeologist to address issues of looting, to help protect the site and help with the Forest's long term management of the site.
John Muir Project 3	Using what are essentially 30 acre clear cuts around the perimeter of each aspen grove is not supported by the best science. A more scientifically-supported, fiscally efficient and ecologically-sound management approach would be the use of managed mixed-intensity fire, and post-treatment fencing to exclude domestic livestock.	The issue is irrelevant to the decision to be made. The combined acreage for all aspen restoration within the project area is 22.8 acres. There are no active range allotments within the five subwatersheds (5,330 acres) the Gibsonville project falls within.